

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

STRIKE, LLC. )  
 )  
 Plaintiff, )  
 )  
 v. ) Case No. CIV-20-571-G  
 ) Judge: Hon. Charles Goodwin  
 SANDY CREEK FARMS, INC., )  
 STEVE BARRINGTON, )  
 JOHN DOE #1, )  
 JOHN DOE #2, )  
 JOHN DOE #3, and )  
 JOHN DOE #4, )  
 )  
 Defendants. )

**DECLARATION OF STEVE BARRINGTON IN SUPPORT OF  
RESPONSE IN OPPOSITION TO PLAINTIFF'S REQUEST  
FOR ENTRY OF DEFAULT**

\_\_\_\_\_  
/s/ Elaine M. Dowling \_\_\_\_\_  
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Local Counsel for Sandy Creek Farm,  
Inc. and Steve Barrington

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4<sup>th</sup> day of August, 2020, I filed the above document with the Clerk of Court. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the Electronic Case Filing System.

\_\_\_\_\_  
/s/ Elaine M. Dowling \_\_\_\_\_



IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) STRIKE, LLC

§

*Plaintiff,*

§

vs.

Case No. CIV-20-571-PRW

(1) SANDY CREEK FARMS, INC.,  
(2) STEVE BARRINGTON,  
(3) JOHN DOE #1,  
(4) JOHN DOE #2,  
(5) JOHN DOE #3, and  
(6) JOHN DOE #4,

§

*Defendants.*

§

**DECLARATION OF STEVE BARRINGTON UNDER 28 U.S.C. §1746 IN  
OPPOSITION TO STRIKE'S REQUEST FOR ENTRY OF DEFAULT**

My name is Steve Barrington and I am above the age of 18, competent to testify and have personal knowledge of the matters set forth in this Declaration. Under penalty of perjury, I state the following:

1. I am one of three owners of Sandy Creek Farms, Inc. (Sandy Creek) which was created to own the Sandy Creek Farm in Grady County, Oklahoma, which has been in operation for approximately 30 years. My brother, Randy Barrington, resides on an adjacent tract of land approximately 900 feet northeast of the pipeline running through the Sandy Creek Farm.

2. As filed with the Oklahoma Secretary of State, Kay Barrington is the sole Registered Agent for the corporation Sandy Creek Farms, Inc. *See* Sandy Creek Farms, Inc., Corp. Info., Ex. 1.

3. I reviewed the attached Summons and Affidavits of Service filed with the court in this case which states that I was served with the Summons and Complaint both individually and in my purported capacity as registered agent for the corporation.

Sandy Creek Farms, Inc., Summons and Aff., Ex. 2, ECF No. 6; Barrington Summons and Aff., Ex. 3, ECF No. 7.

4. I was not personally served with the Summons and Complaint. In fact, on the date that I was purported to have been served – June 24, 2020 – I was in close contact with counsel preparing to defend against a Motion for a Temporary Restraining Order in *Midship Pipeline Co., LLC, v. Tract No. CN-0004.000, 1.504 Acres of Land, More or Less, Permanent Easement in Canadian County, Oklahoma, et al.*, 5:2018-cv-00858 (W.D. Okla.), scheduled for June 26, 2020, in a related case. If I had received the Summons, I would have provided it to my attorney.

5. Kay Barrington was not personally served with either corporate or personal documents in the above-captioned case. I first learned of this civil action by receiving Strike's Request for Entry of Default via post. I immediately shared a copy with my consultant, Central Land Consulting, and counsel.

Under penalty of perjury, I declare that the above-statement is true to the best of my personal knowledge.

  
Signature of Steve Barrington

8-4-2020  
(Date)